

Appl. No. 10/770,737  
Reply to Office action of Oct. 4, 2005

## REMARKS

This is intended as a full and complete response to the Office Action dated October 04, 2005, having a shortened statutory period for response set to expire on January 04, 2006. Please reconsider the claims pending in the application for reasons discussed below.

Claims 1-20 remain pending in the application and are shown above. Claims 1-20 stand rejected by the Examiner. The Applicants have cancelled claims 4, 7, 8, and 10-20 and have added new claims 21-31. Reconsideration of the claims is requested for reasons presented below.

### A. Claim Rejections – 35 U.S.C. § 112

Claims 1-18 stand rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention.

The Examiner states that claim 1 is confusing since it is unclear what an electroless activation cell encompasses, especially since dependent claim 7 claims the electroless activation cell is configured to selectively dispense at least one of a substrate pre-cleaning solution and an electroless activation solution onto the substrate and therefore does not require activation of the substrate rather may be limited to just pre-cleaning of the substrate. The Examiner further states that claim 1 is confusing since it is unclear what an electroless deposition cell encompasses, especially since dependent claim 8 claims the electroless deposition cell is configured to selectively dispense at least one of a substrate post-cleaning solution and an electroless deposition solution onto the substrate and therefore does not require activation of the substrate rather may be limited to just post-cleaning of the substrate. The Applicants have cancelled claims 7 and 8 without prejudice obviating these rejections. Accordingly, withdrawal of the rejection is respectfully requested.

The Examiner states that claim 11 is confusing since the preamble of the claim recites an electroless processing system, yet the elements in the body of the claim fail to require a means for depositing an electroless deposition with the second fluid processing cell not required to depositing an electroless deposition solution onto the

Appl. No. 10/770,737  
Reply to Office action of Oct. 4, 2005

substrate. The Applicants have cancelled claim 11 without prejudice obviating this rejection. Accordingly, withdrawal of the rejection is respectfully requested.

Claims 4, 10, 12-16 and 18-20 stand rejected under 35 U.S.C. § 112, first paragraph, as failing to comply with the written description requirement. The Applicants have cancelled claims 4, 10, 12-16 and 18-20 without prejudice obviating this rejection. Accordingly, withdrawal of the rejection is respectfully requested.

### **B. Double Patenting**

Claims 1, 9, 11 and 17 are rejected under the judicially created doctrine of obviousness-type double patenting as being unpatentable over claims 1-25 of U.S. Patent No. 6,699,380 to *Chen et al.* (hereinafter referred to as "*Chen*") in view of United States Patent No. 6,267,853 to *Dordi et al.* (hereinafter referred to as "*Dordi*"). The Applicants are submitting a terminal disclaimer on a separate page. The Applicants have cancelled claims 11 and 17 without prejudice. The Applicants respectfully requests withdrawal of the rejection of claims 1 and 9.

### **C. Claim Rejections – 35 USC § 102**

Claims 1-8, 11-13 and 15 stand rejected under 35 U.S.C. § 102(b) as being anticipated by United States Patent No. 6,267,853 to *Dordi et al.* (hereinafter referred to as "*Dordi*"). The Applicants traverse the rejection.

Independent claim 1, as amended recites limitations not taught, shown or suggested by *Dordi*. *Dordi* discloses a system comprising a mainframe having a mainframe wafer transfer robot, a loading station disposed in connection with the mainframe, one or more processing cells disposed in connection with the mainframe, and an electrolyte supply fluidly connected to the one or more electrical processing cells (see column 3, lines 49 to 55). *Dordi* discloses one or more electroless deposition cells disposed in the seed layer repair station 215. Although *Dordi* discloses a processing system, which may include an electroless deposition cell, the system is not a modular processing system (see generally column 12 lines 21-22 and Figures 2 and 3). Therefore, *Dordi* does not teach or show or suggest an electroless processing system,

Appl. No. 10/770,737  
Reply to Office action of Oct. 4, 2005

comprising an interface section having a substrate transfer robot positioned thereon; and an electroless processing module positioned in communication with the interface section, the electroless processing module comprising a processing enclosure, an electroless activation cell positioned in the enclosure, an electroless deposition cell positioned in the enclosure and an enclosure robot configured to transfer substrates between the activation cell and the deposition cell as recited by claim 1. Accordingly, the Applicants submit that claim 1 and dependent claims 2, 3, 5, 6, and 9 are allowable and respectfully requests allowance of these claims.

Applicants have cancelled claims 4, 7, 8, 11-13 and 15 without prejudice obviating these rejections.

#### **D. Claim Rejections – 35 USC § 103**

Claims 10, 16 and 18-20 are rejected under 35 USC § 103(a) as being unpatentable over *Dordi*. The Applicants have cancelled claims 10, 16 and 18-20 without prejudice obviating these rejections. Accordingly, Applicant respectfully requests the rejection be withdrawn.

Applicants have added new claims 21-31 to claim additional aspects of the invention. Applicants believe that no new matter has been entered. Applicants respectfully request allowance of new claims 21-31.

Having addressed all issues set out in the office action, Applicants respectfully submit that the claims are in condition for allowance and respectfully request that the claims be allowed.

Respectfully submitted,



---

Keith M. Tackett,  
Registration No. 32,008  
PATTERSON & SHERIDAN, L.L.P.  
3040 Post Oak Blvd. Suite 1500  
Houston, TX 77056  
Telephone: (713) 623-4844  
Facsimile: (713) 623-4846  
Attorney for Applicant(s)